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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF ALYSSA G. OLSON  
IN SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF GOOGLE'S REPLY IN  
SUPPORT OF MOTION FOR SUMMARY  
JUDGEMENT**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Alyssa G. Olson, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.  
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google  
7 LLC’s Administrative Motion to Seal Portions of Google’s Reply in Support of Motion for  
8 Summary Judgment (“Motion”). In making this request, Google has carefully considered the  
9 relevant legal standard and policy considerations outlined in Civil Local Rule 79-5. Google makes  
10 this request with the good faith belief that the information sought to be sealed consists of Google’s  
11 confidential information and that public disclosure could cause competitive harm.

12 3. The information requested to be sealed contains Google’s non-public, sensitive  
13 confidential and proprietary business information that could affect Google’s competitive standing  
14 and may expose Google to increased security risks if publicly disclosed, including details related to  
15 Google’s internal projects, internal identifiers, data signals and logs, and their proprietary  
16 functionalities, as well as internal metrics, which Google maintains as confidential in the ordinary  
17 course of its business and is not generally known to the public or Google’s competitors.

18 4. Such highly confidential information reveals Google’s internal strategy and systems  
19 regarding various important products and nonpublic investigations thereto and falls within the  
20 protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. The redacted  
21 portions also contain, summarize or reflect material designated, Confidential or Highly Confidential  
22 – Attorneys’ Eyes Only Pursuant to Stipulated Protective Order.

23 5. Public disclosure of such highly confidential information could affect Google’s  
24 competitive standing as competitors may alter their system designs and practices relating to  
25 competing products, time strategic litigation, focus their patent prosecution strategies, or otherwise  
26 unfairly compete with Google. It may also place Google at an increased risk of cybersecurity threats,  
27 as third parties may seek to use the information to compromise Google’s internal systems and  
28 operations.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in Culver City, California on April 26, 2023.

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

*Attorney for Defendant*